

July 9, 2003

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: **Notice of Oral Ex Parte Presentation**
WT Docket No. 94-102; WT Docket No. 02-377

Dear Ms. Dortch:

On July 8, 2003, representatives of the Rural Cellular Association ("RCA") and of members of RCA, as listed below, met with Wireless Telecommunications Bureau Chief John Muleta and Joel Taubenblatt, Eugenie Barton and Jennifer Tomchin of the Wireless Telecommunications Bureau, and discussed problems encountered by rural and small market wireless carriers in the deployment of Phase II of E911.

The following persons representing RCA or its members participated in the meeting:

Arthur L. Prest, Alpine PCS, Inc. and RFB Cellular, Inc.
Tom Attar, Highland Cellular
James Callahan and Troy Danos, MobileTel
Sylvia Lese, Kraskin & Lese
David L. Nace and Todd Slamowitz, Lukas, Nace, Gutierrez & Sachs, Chtd.

During the meeting there was discussion of obstacles to compliance encountered by many members of RCA relating to current FCC deadlines for Phase II implementation and to the location accuracy standards contained in the Commission's rules. There was also discussion of the lack of immediately available GSM handsets with Phase II capability, and the general inability of carriers in rural areas to meet accuracy requirements due to cell site configuration and terrain limitations.

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While circumstances vary from carrier to carrier in each rural area, common problems are evident. It is anticipated that carriers will be filing petitions for temporary extension and waiver of Commission rules as deadlines approach.

Very truly yours,

/s/ David L. Nace

David L. Nace

cc: John Muleta, Chief, Wireless Telecommunications Bureau
Joel Taubenblatt
Eugenie Barton
Jennifer Tomchin